

**AFFIDAVIT OF MATTHEW W. BLOOM, PRESIDENT AND CEO**

**COMMONWEALTH OF PENNSYLVANIA** )  
 )  
**COUNTY OF YORK** ) **SS:**

Matthew W. Bloom, President and CEO of CRIMEWATCH Technologies, Inc., being duly sworn, deposes and says:

If the Harrisburg Police Department (“HPD”) hires someone new and the HPD wants the new hire to learn how to use the CRIMEWATCH platform, the HPD could theoretically purchase additional online training and would have access to the quick reference cards during the 30-day training period, but not afterwards, i.e., access to the quick reference cards is not unlimited, access is only granted for the 30-day training period. However, HPD does not need to purchase any training materials from CRIMEWATCH and, in fact, has not purchased any training materials from CRIMEWATCH because its existing users can effectively train new hires and new users how to use the system without any online training materials and quick reference cards. As such, HPD has not spent any public funds on the requested training materials.

Our CTO Mike Grucz previously provided an Affidavit in this matter. I think it bears repeating that CRIMEWATCH training manuals are all embedded and integrated directly into the CRIMEWATCH technology platform and releasing these would disclose proprietary design and function of the CRIMEWATCH platform. CRIMEWATCH training and user materials are solely for our paying customers and would contain screenshots including URL/Web Addresses. Releasing these materials to the public would expose sensitive customer-only URLs throughout the CRIMEWATCH Network.

Moreover, these materials would be exposing our highly customized content types, workflows, and processes to competitors giving them sensitive insights into how they could potentially clone CRIMEWATCH's highly matured and refined Software as a Service. Our trademarked ControlShare(tm) technology is also emphasized throughout these materials, putting a key proprietary feature of CRIMEWATCH's products at risk of reverse engineering or cloning by competitors. I emphasize that there is otherwise no use or value in these materials for general public consumption as they cannot access any of the interfaces detailed within; releasing these materials would only be damaging to CRIMEWATCH going forward.

~~Matthew W. Bloom, President and CEO~~  
~~CRIMEWATCH Technologies, Inc.~~

Sworn to me this 31<sup>st</sup> day of  
July, 2019

James E. H. J.  
Notary Public

